

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13  
: :  
Diane L. Lighty : No. 20-10008-AMC  
Debtor : :

ANSWER TO MOTION OF U.S. BANK NATIONAL ASSOCIATION FOR RELIEF  
FROM THE AUTOMATIC STAY

Debtor, by Attorney David M. Offen respectfully submit the following:

This case presents an issue whereby the debtor had a previous bankruptcy. PHFA notified the debtor that the issue that prevented a loan modification from being approved is that the liens on the property needed to be handled. The debtor filed a new bankruptcy in this case proposing to pay off the liens in full inside the Chapter 13 plan and get a loan modification. PHFA says that the liens cannot just be paid in full in a confirmed plan but must be paid off in full prior to the distribution of any modification funds. If the monies owed on the liens could be paid off then PHFA indicated that the debtor could get a loan modification. Debtor's counsel seeks an approach to allow the liens to be paid off and in conjunction with the same to allow the debtor to get the loan modification.

WHEREFORE, the Debtor respectfully requests that the Movant's Motion for Relief be DENIED.

Respectfully submitted,

/s/ David M. Offen  
David M. Offen  
Attorney for Debtor

Dated: 9/1/20

CERTIFICATE OF SERVICE

The following has been served by electronic mail:

Rebecca Solarz on behalf of U.S. Bank, N.A.

[Bkgroup@kmlawgroup.com](mailto:Bkgroup@kmlawgroup.com)

/s/ David M. Offen  
David M. Offen  
Attorney for Debtor

Dated: 9/1/20